

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

<i>In re:</i>	§	CAUSE NO. 19-20025
	§	
Kent Linduff	§	Chapter 7
	§	
<i>Debtor</i>	§	
	§	
	§	

**OBJECTION OF LISA ROBERTS TO DEBTOR’S AMENDED MOTION
TO CONVERT TO CHAPTER 13 (DOCKET NO. 42)**

To the Honorable David R. Jones:

Creditor Lisa Roberts (“Ms. Roberts”) hereby files her response to the Debtor’s Amended Motion to Convert to Chapter 13 (“Amended Motion;” Docket No. 42), and in support of the same would show the Court the following.

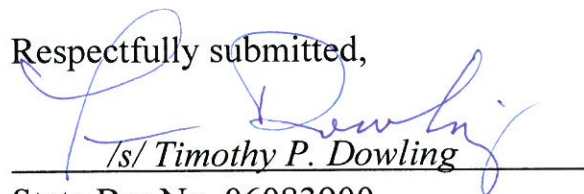
1. On April 23, 2019 the Debtor filed a motion to convert to Chapter 13 (Motion;” Docket No. 35). Both Ms. Roberts and the Chapter 7 trustee filed timely objections to the Motion (Docket Nos. 37, 38). On May 19, 2019 the Debtor filed an amended motion to convert Chapter 13 that appears identical to his prior motion except that this time he added on page 1 of the Amended Notice the notice language required by Southern District of Texas Local Bankruptcy Rule 9013-1(b). Ms. Roberts hereby files her response to the Amended Motion as set forth below.

2. Ms. Roberts incorporates by reference in response to the Amended Motion her prior response to the Motion. Ms. Roberts also incorporates by reference by way of further response to the Amended Motion paragraphs 23-30 of the Trustee's response to the Motion.

3. Furthermore, on May 20, 2019 Ms. Roberts filed a timely adversary proceeding objecting to the Debtor receiving a bankruptcy discharge of the indebtedness he owes to her. See Adversary No. 19-02015. Similarly, on the same date, another creditor filed an adversary proceeding objecting to the Debtor receiving a discharge of the large alleged indebtedness owed to that creditor. See Adversary No. 19-02016. Even if there were not already much more than adequate grounds to deny both the Motion and the Amended Motion, the filing of these adversary proceedings constitute further reasons to keep this case in Chapter

4. Ms. Roberts requests that the Court deny both the Motion and the Amended Motion by signing the proposed order attached hereto as Exhibit A, and additionally grant her such further additional relief, whether in law or in equity, as may be just.

Respectfully submitted,



/s/ Timothy P. Dowling

State Bar No. 06083900
Southern District of Texas No. 2431
Anderson, Lehrman, Barre & Maraist, LLP

Bankruptcy counsel for Lisa Roberts
1001 Third St., Suite 1
Corpus Christi, Texas 78404
Telephone: (361) 884-4981
FAX: (361) 884-1286
Email: tdowling@albmlaw.com

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on May 22, 2019 a true and correct copy of the foregoing pleading was filed online with the Clerk of the Bankruptcy Court and was also served in the manner indicated below on the persons named below:

First class mail

Ryan Lott
The Lott Firm, PLLC
Counsel for the Debtor
3422 Rosefinch Trail
Austin, Texas 78746

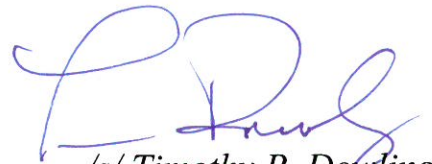
Simon W. Hendershot, III
Hendershot, Cannon & Hisey, P.C.
1800 Bering Drive, Suite 600
Houston, Texas 77057

Catherine Stone Curtis
Pulman, Cappuccio & Pullen, LLP
Chapter 7 trustee
P.O. Box 720788
McAllen, Texas 78504

Thomas Rice
Pulman Cappuccio & Pullen, LLP
Counsel for the Chapter 7 trustee
2161 NW Military Highway, Ste. 400
San Antonio, TX 78213

Jennifer F. Wertz
Jackson & Walker, LLP
1401 McKinney Street, Suite 1900
Houston, Texas 77010

Parties listed on Exhibit B



/s/ Timothy P. Dowling